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Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JESSICA LEE, individually and on behalf of a
class of similarly situated individuals,

Plaintiff,

v.

STONEBRIDGE LIFE INSURANCE
COMPANY, a Vermont corporation, and
TRIFECTA MARKETING GROUP LLC, a
Florida limited liability company,

Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND
~~PROPOSED~~ ORDER
REGARDING EXTENSION OF
EXPERT DISCOVERY
DEADLINE**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011
Trial Date: June 23, 2014

1
2 Defendant Stonebridge Life Insurance Company (“Stonebridge”) and Plaintiff Jessica Lee
3 (collectively with Stonebridge, the “Parties,” each a “Party”), by and through their respective
4 counsel of record, hereby enter into the following stipulation:

5 WHEREAS, on May 28, 2013, the Court entered an order setting the deadline for
6 completion of all expert discovery for September 27, 2013. (ECF No. 112.)

7 WHEREAS, on August 8, 2013, the Parties exchanged Rule 26(a)(2) expert reports;

8 WHEREAS, on September 6, 2013, the Parties exchanged rebuttal expert reports;

9 WHEREAS, the Parties have propounded written discovery requests on experts, and the
10 experts have responded to such requests;

11 WHEREAS, as a result of scheduling conflicts, the Parties have been unable to schedule
12 expert depositions for mutually convenient times prior to the current September 27 deadline;

13 WHEREAS, the Parties have agreed to schedule the depositions of two experts on
14 October 3, 2013, and October 4, 2013;

15 WHEREAS, the Parties expect to reach agreement on the schedule for the remaining
16 expert depositions shortly;

17 WHEREAS, this case is not set for trial until June 23, 2014, and a short extension of the
18 deadline for completion of expert discovery should not impact other case deadlines;

19 THEREFORE, subject to the approval of the Court, the Parties agree and stipulate as
20 follows:

21 1. The deadline for completion of expert discovery is extended from September 27,
22 2013 to October 25, 2013.

IT IS SO STIPULATED.

Dated: September 25, 2013.

MORRISON & FOERSTER LLP

By: /s/ Tiffany Cheung

TIFFANY CHEUNG

Attorneys for Defendant
STONEBRIDGE LIFE INSURANCE
COMPANY

Dated: September 25, 2013

EDELSON LLC

By: /s/ Ryan D. Andrews

RYAN D. ANDREWS

Attorneys for Plaintiff
JESSICA LEE and the class

ATTESTATION OF FILER

I, Tiffany Cheung, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories. *See* L.R. 5-1(i)(3).

Dated: September 25, 2013

By: /s/ Tiffany Cheung

TIFFANY CHEUNG

MORRISON & FOERSTER LLP

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 9/26/13



Hon. Richard Seeborg
United States District Judge